

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

June 1st, 2022  
Ravi Subramanian, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

v.

RAJINDER PAL SINGH, aka JASPAL GILL  
Defendant.

NO. **CR22-079 JCC**  
INDICTMENT

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Transport and Harbor Certain Aliens for Profit)**

Beginning at a time unknown, and continuing until May 24, 2022, in Whatcom,  
King, and Thurston Counties, within the Western District of Washington, and elsewhere,  
RAJINDER PAL SINGH, and others known and unknown, did knowingly and  
intentionally conspire to transport and move certain aliens, who had come to, entered and  
remained in the United States in violation of law, within the United States by means of  
transportation and otherwise, in furtherance of such violation of law, and to conceal,  
harbor and shield from detection by immigration authorities such aliens, with the intent to  
violate the law, for the purpose of commercial advantage or private financial gain.

1 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), (iii),  
2 and (v)(I), and 1324(a)(1)(B)(i).

3 **FORFEITURE ALLEGATION**

4 The allegations contained in Count 1 of this Indictment are hereby realleged and  
5 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the  
6 offense alleged in Count 1, RAJINDER PAL SINGH shall forfeit to the United States,  
7 pursuant to Title 8, United States Code, Section 1324(b)(1), by way of Title 28, United  
8 States Code, Section 2461(c), and Title 18, United States Code, Section 982(a)(6)(A), all  
9 property used to commit, or to facilitate commission of the offense, and any proceeds of  
10 the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendants,

- 3 a. cannot be located upon the exercise of due diligence;  
4 b. has been transferred or sold to, or deposited with, a third party;  
5 c. has been placed beyond the jurisdiction of the Court;  
6 d. has been substantially diminished in value; or  
7 e. has been commingled with other property which cannot be divided  
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

12  
13 A TRUE BILL:

14 DATED: 01 JUNE 2022

15  
16 *Signature of Foreperson redacted pursuant*  
17 *to the policy of the Judicial Conference of*  
18 *the United States.*

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21 FOREPERSON

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26  
27  
28  
NICHOLAS W. BROWN  
United States Attorney

THOMAS WOODS  
Assistant United States Attorney

JOSEPH C. SILVIO  
Assistant United States Attorney